

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DEBORAH GENATOSSIO and
MICHAEL GENATOSSIO,
Plaintiffs

v.

NORTH AMERICAN AIRLINES, INC.,
Defendant

CIVIL ACTION NO. 05-10881RGS

**SECOND AMENDED JOINT STATEMENT PURSUANT TO
FED.R.CIV.P. 26(f) AND L.R. 16.1(b)**

This matter was originally scheduled for a scheduling conference on September 19, 2005, was rescheduled to October 3, 2005 and then moved to November 7, 2005. Thus, the parties to the above-captioned matter, by and through their attorneys, hereby submit the following second amended joint statement:

1. Pursuant to Fed.R.Civ.P. 26(f) and L.R. 16.1(b), they conferred for the purpose of:
 - a. Preparing an agenda of matters to be discussed at the scheduling conference;
 - b. Preparing a proposed pretrial schedule for the case that includes a plan for discovery; and
 - c. Considering whether they will consent to trial by magistrate judge.

2. After consideration of the topics contemplated by Fed.R.Civ.P. 16(b) and 26(f) the parties propose the following pretrial schedule:

Pretrial Activity

Date

Required disclosures (26(a))

November 21, 2005

Written discovery requests

January 9, 2006

Motions to amend or supplement pleadings	January 30, 2006
Non-expert disclosures by Plaintiff	March 14, 2006
Non-expert disclosures by Defendant	April 14, 2006
Final answers to expert interrogatories by plaintiff	April 14, 2006
Final answers to expert interrogatories by defendant	May 12, 2006
All discovery completed	June 12, 2006
All dispositive motions filed	August 11, 2006

Dated: November 4, 2005

Respectfully submitted,
Plaintiffs,
DEBORAH GENATOSSIO AND
MICHAEL GENATOSSIO,

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The Defendants,
NORTH AMERICAN AIRLINES, INC.

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